

EXHIBIT Q

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE STREET GROUP, LLC,

Plaintiff,

v.

MILLENNIUM MANAGEMENT LLC,
DOUGLAS SCHADEWALD, and DANIEL
SPOTTISWOOD

Defendants.

Civil Action No. 24-cv-2783

Judge Engelmayer

**EXHIBIT Q TO THE
DECLARATION OF DEBORAH K.
BROWN IN SUPPORT OF ORDER
TO SHOW CAUSE**

FILED UNDER SEAL

PLAINTIFF'S EXPEDITED DISCOVERY REQUESTS

Requests For Production

The Documents requested are to be produced in industry-standard electronic formats pursuant to a discovery protocol to be agreed to by the parties. Unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning and shall be interpreted in their common and ordinary sense.

REQUEST NO. 1: All documents and communications relating to Millennium's efforts to recruit and hire Mr. Schadewald and/or Mr. Spottiswood, including compensation-related documents, employment agreements, and documents relating to profits earned by trades made at Jane Street by Mr. Schadewald and/or Mr. Spottiswood;

REQUEST NO. 2: Records of all transactions and all orders ([REDACTED])
[REDACTED]) in the India market ([REDACTED])
[REDACTED]) made by or at the direction of Mr. Schadewald or Mr. Spottiswood, or their related pod;

REQUEST NO. 3: Millennium's profit & loss (P&L) statements relating to all such trading activities;

REQUEST NO. 4: A historic P&L statement, by week, for Millennium's trading activities in the India market since January 1, 2023, separated by asset type: [REDACTED]
[REDACTED]; and

REQUEST NO. 5: All communications sent to or from Mr. Schadewald or Mr. Spottiswood from January 1, 2024 to present relating to (i) the India market or (ii) Jane Street, including any discussion of Jane Street's confidential information, intellectual property, trade secrets, business strategies, trading strategies, trading methods, market positions, P&L, or confidentiality or non-disclosure obligations.

Deposition Requests

Jane Street seeks to depose (1) Douglas Schadewald and (2) Daniel Spottiswood in advance of the hearing for a preliminary injunction.

Dated: New York, New York
April 16, 2024

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

By : /s/ Deborah K. Brown

Alex Spiro
Deborah K. Brown
Jeffrey C. Miller
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
alexspiro@quinnemanuel.com
deborahbrown@quinnemanuel.com
jeffreymiller@quinnemanuel.com

Greg Miraglia (*pro hac vice forthcoming*)
300 West 6th Street
Austin, Texas 78701
Telephone: (737) 667-6100
gregmiraglia@quinnemanuel.com

Jeff Nardinelli (*pro hac vice forthcoming*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
jeffnardinelli@quinnemanuel.com

Attorneys for Plaintiff